Office of the Privacy Commissioner of Canada

2014-15

Departmental Performance Report

Original signed by

The Honourable Jody Wilson-Raybould, P.C., M.P.
Minister of Justice and Attorney General of Canada

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Message from the Privacy Commissioner of Canada

I am pleased to present the Departmental Performance Report of the Office of the Privacy Commissioner of Canada for the fiscal year ending March 31, 2015.

This past year was dominated by the question of government surveillance and the response to terrorism, following the debate on Bill C-13 and access by police forces to data from telecommunications providers, as well as the debate on the antiterrorism Bill C-51, which came on the heels of the attacks in Parliament and in St-Jean-sur-Richelieu.

Other notable events of the year included the passing of Bill S-4, which introduces some useful modifications to modernize PIPEDA, the Supreme Court's *R. v. Spencer* decision and the protection it offers for certain client-related information held by telecommunications service providers, the guidance document on the use of body cameras by law enforcement agencies (signed jointly by my counterparts in the provinces and territories) and my Office's statement concerning the use of genetic test results by life and health insurance companies.

An increasing number of Canadians say that they are concerned about privacy. Nine out of ten Canadians surveyed said that they are concerned about protecting their privacy and one out of three (34%) said they are *extremely* concerned—a marked increase compared with 25% in 2012. Their complaints about privacy issues have increased constantly in the past five years and our investigations are becoming more and more complex. We have also prepared to meet the new obligations that come with the adoption of bills S-4 and C-51.

Improving our services to Canadians in this context requires constant attention. We are making best use of the methods granted to us by the law to meet our obligations (informal resolution of complaints, management of numerous complaints, frequent complainants, etc.). We are focusing our efforts where they will produce the most useful results, while working with our provincial and international partners. And we continue to seek new means of being more efficient. This is why we undertook a review of operational challenges related to investigations under the *Privacy Act*.

Collectively, we are now looking to the future and have started shifting our focus to new priorities. My team has deployed across the country to speak with key figures in the public and private sectors, academics, non-governmental organizations, consumer groups and the public. This in-depth reflection concludes in the spring of 2015 with the publication of our priorities for the next five years. As a result, we will be able to concentrate our efforts and target the most significant results for our fellow citizens. This will be our guide for meeting the objective that I set for myself when I accepted my mandate: to increase the control Canadians have over their personal information. After nearly one year in office, I am confident that my team has the necessary motivation and depth to meet this challenge successfully.

Original signed by

Daniel Therrien
Privacy Commissioner of Canada

Section I: Organizational Expenditure Overview

Organizational Profile

Appropriate Minister[1]**:** Jody Wilson-Raybould

Institutional Head: Daniel Therrien

Ministerial portfolio[2]**:** Department of Justice Canada

Enabling Instrument(s): *Privacy Act*[i], R.S.C. 1985, c. P-21; *Personal Information Protection and Electronic Documents Act*[ii], S.C. 2000, c.5

Year of Incorporation / Commencement: 1982

Organizational Context

Raison d'être

As an Agent of Parliament, the Privacy Commissioner of Canada reports directly to the House of Commons and the Senate. The mandate of the Office of the Privacy Commissioner of Canada (OPC) is to oversee compliance with both the *Privacy Act*, which covers the personal information-handling practices of federal government departments and agencies, and the *Personal Information Protection and Electronic Documents Act* (PIPEDA), Canada's private-sector privacy law, along with some aspects of Canada's anti-spam law (CASL). The OPC's mission is to protect and promote the privacy rights of individuals[3].

Responsibilities

The Privacy Commissioner's powers to further the privacy rights of Canadians include:

- investigating complaints, conducting audits and pursuing court action under the *Privacy Act* and PIPEDA;
- publicly reporting on the personal information-handling practices of public- and private-sector organizations;
- supporting, undertaking and publishing research into privacy issues; and
- promoting public awareness and understanding of privacy issues.

The Commissioner works independently of government to investigate federal public sector related-complaints from individuals under the *Privacy Act* and complaints related to the private sector under PIPEDA. He also has some designated responsibilities to ensure compliance with CASL. While his mandate to investigate includes mediation and conciliation, the Commissioner

[1] The Commissioner works independently of government cabinet ministers and reports directly to Parliament. For the purposes of tabling Main Estimates, DPRs and RPPs, the Commissioner submits reports via the Minister of Justice.
[2] *Ibid*
[3] Reference is made to "individuals" in accordance with the legislation.

has the power to summon witnesses, administer oaths, and compel the production of evidence. In cases where the investigation does not result in a voluntary agreement/resolution and remains unresolved, the Commissioner may seek an order from the Federal Court to address the situation under specified circumstances.

Strategic Outcome and Program Alignment Architecture (PAA)

1. **Strategic Outcome:** The privacy rights of individuals are protected
    - **1.1 Program:** Compliance Activities
    - **1.2 Program:** Research and Policy Development
    - **1.3 Program:** Public Outreach

Internal Services

Organizational Priorities

Priority	Type[4]	Strategic Outcome
1. Effectively manage the organization through a period of transition.	New	This priority is linked to the OPC's single Strategic Outcome: The Privacy rights of individuals are protected.
Summary of Progress		
In 2014-15, the OPC effectively managed key transitions, namely, the adaptation to a new modern work environment following the move of its headquarter offices to Gatineau, Quebec, in February 2014, and the appointment of a new Privacy Commissioner in June 2014. The OPC continued to address the privacy concerns of Canadians throughout these transitions and worked to maintain service excellence. The Office implemented new tools to ensure that it continues to provide a quality service and options to those who contact the Office for information and advice and implemented enhancements to its intake, investigative, and incident processes and strengthened collaboration across the OPC. Supporting staff, whose commitment to the mission of protecting and promoting privacy has been unwavering, was key to the Office's ability to carry out its mandate throughout the transition period. The OPC Change Management Strategy was leveraged to ensure transitional changes were implemented in a consistent and effective manner and to strengthen communication with employees. Increased internal communication efforts and the use of new tools for staff engagement helped to support employees through the transitions. The Commissioner received intensive briefings on key issues from staff in his first one hundred days. Meetings were held with key stakeholders across the country to establish new relationships with government departments, industry associations, businesses, academics, civil society and consumer groups. The Commissioner was introduced to, and established new working relationships with his counterparts provincially, territorially and internationally in the data protection community.		

[4] Type is defined as follows: **previously committed to** – committed to in the first or second fiscal year prior to the subject year of the report; **ongoing** – committed to at least three fiscal years prior of the report; and **new** – newly committed in the reporting year of the Report on Plans and Priorities or the Departmental Performance Report.

Priority	Type[4]	Strategic Outcome
The OPC embarked on an internal and external exercise to establish new privacy priorities for the next five years to assist in achieving the Commissioner's goal of increasing the control Canadians have over their personal information. Such work will help the office focus its proactive efforts into areas of greatest risk where the Office can have maximum effect. More details on results achieved in support of this priority can be found in the Performance Results section under each Program.		
2. Continually enhance service to Canadians.	Previously committed	This priority is linked to the OPC's single Strategic Outcome: The Privacy rights of individuals are protected.
Summary of Progress		
This year, the OPC continued to look for creative ways to streamline processes and make use of technology to remain responsive to Canadians. For instance, the Office introduced a new online tool enabling individuals to comment about particular privacy matters, providing enhanced service to Canadians by opening another avenue for individuals to engage the OPC to share their thoughts and concerns. Communications efforts support compliance and reduce the need for formal enforcement action. Another example is the annual Global Privacy Enforcement Network (GPEN) Privacy Sweep, a coordinated effort by privacy enforcement authorities across Canada and around the world to assess the privacy communications of popular apps and websites. By publicizing the concerns raised in the Sweep, the OPC was able to effect positive change to the privacy communications of a number of organizations, without the need for costly investigations. The OPC investigation, early resolution and breach handling approaches were calibrated to address privacy concerns as efficiently and effectively as possible. The Office focused on identifying and applying the appropriate compliance intervention tools at the earliest possible stage of the complaint and breach handling process in order to maximize efficiency and provide Canadians with a positive and timely privacy outcome. For example, a realignment of resources allowed for a significant increase in early resolution results – which represents a less formal and more expedient investigation process focusing on mediation to resolve PIPEDA complaints. The Office continued to cooperate with domestic and international counterparts to offer a more strategic, coordinated, global response to cross-border issues, as well as leverage limited resources. The OPC worked closely with its enforcement partners and continued to enhance its internal technology laboratory capacity to meet its investigative responsibilities under CASL. The OPC renewed its Memorandum of Understanding with Alberta and British Columbia to continue to collaborate on investigations, policy and research work. The Office also co-hosted the Federal/Provincial/Territorial (FPT) Commissioners meeting in Ottawa which, as a group, committed to continue working strategically on issues. On the international front, a Global Cross Border Enforcement Cooperation Arrangement was endorsed by data protection authorities, with a goal of fostering more coordinated approaches to address cross-border privacy issues. In this area, the OPC continued to participate in joint private sector investigations and collaborative enforcement efforts with international privacy partners. More details on results achieved in support of this priority can be found in the Performance Results section under Program 1.1 – Compliance Activities, Program 1.2 – Research and Policy Development, and Program 1.3 – Public Outreach.		

Risk Analysis

Key Risks

Risk	Risk Response Strategy	Link to Program Alignment Architecture
The first risk relates to the OPC's ability to meet its obligations given the significant increase in the complexity and volume of business, fiscal constraints and uncertainty surrounding the impact of its evolving mandate. This risk is ranked high in terms of likelihood and moderate in terms of impact.	The Office managed this risk throughout the year by monitoring performance against its service standards and by continuing to find strategic and innovative ways to deliver on its mandate. The OPC continued to modernize its investigations processes, streamline its legal services, expand the use of technology and focus on systemic issues of importance to Canadians.	The privacy rights of individuals are protected
The second risk relates to the OPC's ability to effectively manage through a period of transition. This risk stems from the uncertainty related to the impact of key transitions, namely the appointment of a new permanent Commissioner, as well as the Office's move to a new modern work environment. This risk is ranked high in terms of likelihood and moderate in terms of impact.	The Office effectively managed this risk by enhancing internal communications efforts and fostering an open dialogue with employees to remain responsive to the changing environment. A survey was conducted to obtain employees' feedback in the months following the move. The feedback was largely positive and where issues were identified, they were dealt with on a priority basis. The Office also effectively transitioned to new leadership, while managing heavy demands, particularly on the Parliamentary and media fronts.	The privacy rights of individuals are protected
The third risk relates to the OPC's ability to meet the public's expanding expectations, in light of statutory limitations, fiscal constraints and increased workload. This risk is ranked medium in terms of its likelihood and moderate in terms of its impact	The OPC managed this risk by focusing on effective media relations, actively communicating the work and mandate of the Office and maintaining and developing relations with its partners and stakeholders. To further enhance communications and outreach activities, the Office completed projects to improve the usability and accessibility of its Website. It also added two new online forms to assist Canadians in requesting help and sharing their privacy comments and concerns with the Office electronically. In addition, the Office continued to communicate its work through the publication of more guidance documents and case summaries.	The privacy rights of individuals are protected

Strategic Context and Operating Environment

Technological changes and the ability to store vast amounts of information, combined with the tools to analyze such information, and increasing pressures to collect and share more information – whether for law enforcement, national security, business development or program integrity purposes – continue to form the backdrop for significant challenges to privacy protection.

Technology is becoming more personalized, ubiquitous and interconnected. Devices and applications that track our movements, our physical state, our interests, our use of vehicles and even our home appliances continue to grow in availability and popularity. Canada remains one of the highest users of the Internet in the world. The personal information that is collected through our devices and our connections with the Internet are central to the global digital economy.

These vast amounts of information are attracting innovation and transforming business models. Organizations and governments are tempted to retain the information and use powerful analytical tools to find new, creative uses for it, whether for our personal use, to address pressing public policy issues or to detect threats to Canadians' security.

The relationship between government and the private sector continues to become closer. Public-private partnerships and exchanges of personal information challenge privacy and accountability. A number of pieces of legislation introduced and/or debated in 2014-15 concerned greater information collection from the private sector, and increased sharing among federal government institutions and international partners, for national security and law enforcement purposes.

Within this context, significant concern has been expressed about government surveillance. Canadian telecommunications companies are starting to join their US counterparts, as well as many web-based services, in offering "transparency reports" in an attempt to shed light on this information-sharing environment.

At the same time, a significant Supreme Court of Canada ruling affirmed the reasonable expectation of privacy around certain information, namely, telecommunication subscriber information. The ruling found that, in many cases, this data could be the key to unlocking sensitive details about a user's online activities and is therefore worthy of constitutional protection. This ruling reminded us that protecting privacy interests requires us to look not only at the specific information being sought – no matter how seemingly innocuous – but also at what the information may further reveal.

In addition to the heightened external challenges brought about by rapidly-evolving technologies, new business models and increased information-sharing, the OPC's mandate continues to grow with no additional resources. The federal government introduced mandatory material privacy breach reporting to the OPC (and the Treasury Board Secretariat) for federal institutions in May 2014. It also introduced, and, since the reporting period, has passed Bill S-4, the *Digital Privacy Act* which amended PIPEDA to require organizations to report certain breaches to the OPC. It also allows the OPC to enter into court-enforceable compliance agreements with organizations at the end of an investigation. While such measures bolster accountability and privacy governance within institutions and organizations, our Office expects it will be difficult to fulfill all our new responsibilities with the resources we currently receive.

And finally, Canada's anti-spam legislation (CASL) came into force in July 2014, with a shared enforcement role between the OPC, the Canadian Radio-television and Telecommunications Commission (CRTC) and the Competition Bureau. The OPC has already engaged in both enforcement and outreach initiatives to promote compliance with CASL.

Actual Expenditures

Budgetary Financial Resources (dollars)

2014-15 Main Estimates	2014-15 Planned Spending	2014-15 Total Authorities Available for Use	2014-15 Actual Spending (authorities used)	Difference (actual minus planned)
24,320,453	**24,320,453**	**26,234,818**	**25,569,835**	**1,249,382**

The increase between Planned Spending and Total Authorities during 2014-15 represents funding received related to the carry forward, one-time transition pay for the Government of Canada's move to salary payments in arrears in the context of Pay Modernization, collective agreements and employee benefit plans adjustments.

Human Resources (Full Time Equivalents [FTEs])

2014-15 Planned	2014-15 Actual	2014-15 Difference (actual minus planned)
181	176	(5)

As of March 31, 2015, the Office had 176 employees. The variance of 5 full-time equivalents is attributed in part to the delayed staffing of vacant positions and to the normal turnover.

Budgetary Performance Summary for Strategic Outcome(s) and Program(s) (dollars)

Strategic Outcome(s), Program(s) and Internal Services	2014-15 Main Estimates	2014-15 Planned Spending	2015-16 Planned Spending	2016-17 Planned Spending	2014-15 Total Authorities Available for Use	2014-15 Actual Spending (authorities used)	2013-14 Actual Spending (authorities used)	2012-13 Actual Spending (authorities used)
1.1 Compliance Activities	11,672,022	11,672,022	11,675,374	11,736,624	12,610,061	12,031,142	11,423,619	11,800,606
1.2 Research and Policy Development	3,834,863	3,834,863	3,835,821	3,853,321	3,202,156	3,040,117	2,968,987	4,028,548
1.3 Public Outreach	3,096,659	3,096,659	3,097,548	3,113,798	2,573,482	2,508,474	2,698,747	3,500,946
Sub-Total	**18,603,544**	**18,603,544**	**18,608,743**	**18,703,743**	**18,385,699**	**17,579,733**	**17,091,353**	**19,330,100**
Internal Services Subtotal	5,716,909	5,716,909	5,718,551	5,748,551	7,849,119	7,990,102	11,027,772	6,208,756
Total	**24,320,453**	**24,320,453**	**24,327,294**	**24,452,294**	**26,234,818**	**25,569,835**	**28,119,125**	**25,538,856**

The OPC's overall spending stands at approximately $25.5M for 2012-13 and 2014-15. A significant increase can be noted for 2013-14 ($28.1M) related to the relocation of the OPC headquarters from Ottawa to Gatineau. OPC relocation costs include office set up, equipment as well as the new technology infrastructure. The fluctuation caused by the relocation would be larger if it were not for the one-time costs in 2012-13 for cash-outs of severance pay following the renegotiation of collective agreements, and in 2014-15, for the Government of Canada's move to salary payments in arrears in the context of Pay Modernization.

Also of note is the shift in actual spending between internal services and the OPC's other three main programs. It can be explained by the relocation costs but also by the new Treasury Board of Canada Secretariat's *Guide on Internal Services Expenditures: Recording, Reporting and attributing*. This guide clarifies what constitutes internal services expenditures versus program expenditures. The OPC being a small organization, delineating between these types of expenditures has not always been evident. In order to better align itself with the new guide going forward the OPC adopted a very different methodology than in the past, leading to this shift.

Alignment of Spending with the Whole-of-Government Framework

Alignment of 2014–15 Actual Spending with the Whole-of-Government Framework[iii] **(dollars)**

Strategic Outcome	Program	Spending Area	Government of Canada Outcome	2014–15 Actual Spending
1. The privacy rights of individuals are protected	1.1 Compliance Activities	Government Affairs	A transparent, accountable, and responsive federal government	12,031,142
	1.2 Research and Policy Development	Government Affairs	A transparent, accountable, and responsive federal government	3,040,117
	1.3 Public Outreach	Government Affairs	A transparent, accountable and responsive federal government	2,508,474

Total Spending by Spending Area (dollars)

Spending Area	Total Planned Spending	Total Actual Spending
Economic Affairs	0	0
Social Affairs	0	0
International Affairs	0	0
Government Affairs	18,603,544	17,579,733

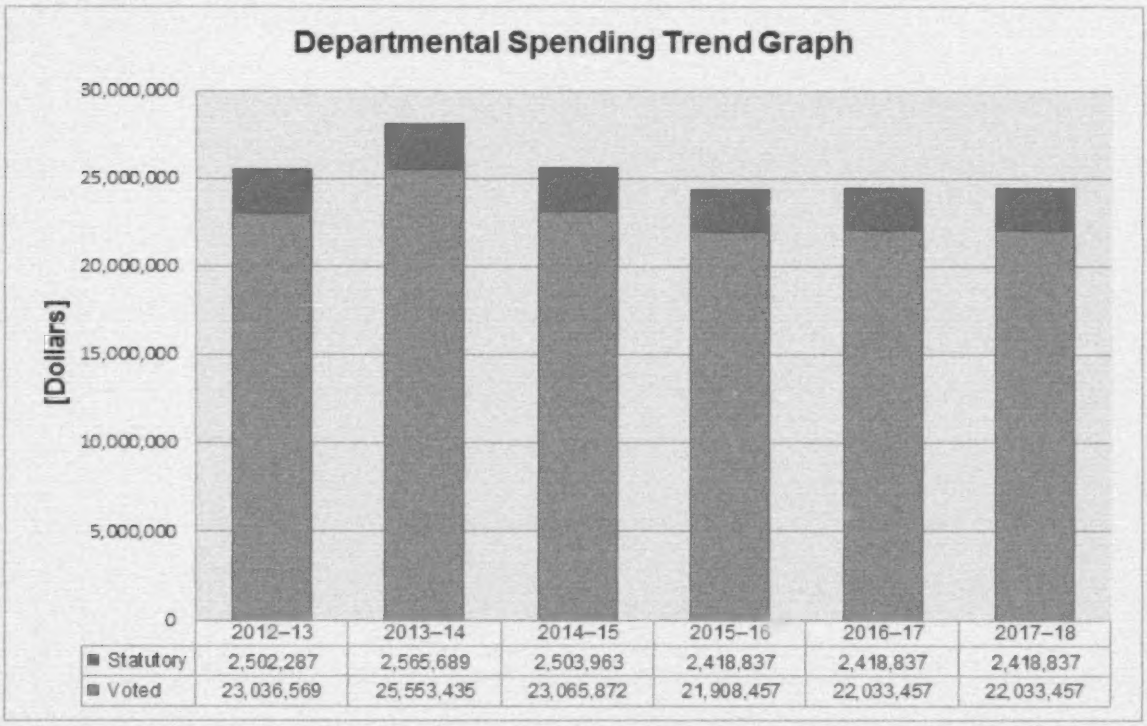
Departmental Spending Trend

The graph below illustrates the OPC's spending trend over a six-year period. From 2012-13 to 2014-15, the figures reflect the expenditures. It shows an increase of $2.5M in expenditures from 2012-13 to 2013-14 and a similar decrease from 2013-14 to 2014-15. The fluctuation in 2013-14 is essentially due to the relocation of the Office from Ottawa to Gatineau.

The spending trend starting in 2015-16 and ongoing will remain stable at approximately $22.0M and reflects the reductions related to the Deficit Reduction Action Plan resulting from the OPC's efforts to find efficiencies within its operations and its use of resources. As well, it reflects a reduction from the one time transition pay incurred in 2014-15 as a result of the Government of

Canada's move to salary payments in arrears in the context of Pay Modernization. For future years, the $125K increase between 2015-16 and 2016-17 is the result of a transfer of funds in 2015-16 to the Canadian Radio-television and Telecommunications Commission to assist with the establishment and lawful operation of the Spam Reporting Center. This transfer sunsets in 2015-16 and will be up for review prior to 2016-17.

The statutory expenditures are the Office's share of the employer portion of the annual employee benefit plan (EBP) costs.



	2012–13	2013–14	2014–15	2015–16	2016–17	2017–18
Statutory	2,502,287	2,565,689	2,503,963	2,418,837	2,418,837	2,418,837
Voted	23,036,569	25,553,435	23,065,872	21,908,457	22,033,457	22,033,457

Expenditures by Vote

For information on the Office of the Privacy Commissioner of Canada's organizational voted and statutory expenditures, consult the *Public Accounts of Canada 2015*[iv] which is available on the Public Works and Government Services Canada website[v].

Section II: Analysis of Program(s) by Strategic Outcome

Strategic Outcome: The Privacy Rights of Individuals are Protected

All OPC efforts and activities are directed towards achieving the organization's single Strategic Outcome, the protection of individuals' privacy rights. The Office plays a leadership role in encouraging organizations that handle Canadians' personal information to respect individuals' privacy rights. Others who contribute to this mission include provincial and territorial privacy commissioners, data-protection authorities around the world, privacy advocacy groups, chief privacy officers, professional associations, consumer representatives, civil society, academics, Parliamentary committees, and federal departments and agencies.

Program 1.1: Compliance Activities

This program oversees compliance with federal privacy legislation for public- and private-sector organizations, thus contributing to the protection of Canadian's privacy rights. Through this Program, the OPC investigates privacy-related complaints and responds to inquiries from individuals and organizations, reviews breach reports and has the power to initiate its own investigations when warranted (Commissioner initiated complaints). Through audits and reviews, the OPC also assesses how well organizations are complying with requirements set out in the two federal privacy laws, and provides recommendations on Privacy Impact Assessments (PIAs), pursuant to the Treasury Board *Directive on Privacy Impact Assessment*. This program is supported by a legal team that provides specialized advice and litigation support, and a research team with senior technical and risk-assessment support.

Budgetary Financial Resources (dollars)

2014-15 Main Estimates	2014-15 Planned Spending	2014-15 Total Authorities Available for Use	2014-15 Actual Spending (authorities used)	2014-15 Difference (actual minus planned)
11,672,022	11,672,022	12,610,061	12,031,142	359,120

Future reference levels have been adjusted to better align with TBS Guide on attributing internal services resources.

Human Resources (FTEs)

2014-15 Planned	2014-15 Actual	2014-15 Difference (actual minus planned)
81	91	10

Future reference levels have been adjusted to better align with TBS Guide on attributing internal services resources.

Performance Results

Expected Results	Performance Indicators	Targets	Actual Results
Intermediate Outcome			
1. Federal government institutions and private-sector organizations meet their obligations under federal privacy legislation.	1.1 Percentage of complaints and incidents (breach notifications and OPC interventions) that are resolved to the satisfaction of the OPC[5]	80%	76%
	1.2 Percentage of audit recommendations substantially implemented two years after publication of the final audit report	75%	100%
Immediate Outcomes			
2. Individuals receive responses to their information requests and complaints.	2.1 Percentage of information requests and complaints responded to within established service standards[6]	90%	96%
3. Federal government institutions and private-sector organizations receive advice and recommendations to improve their privacy practices, in compliance with federal privacy legislation and policies.	3.1 Percentage of the PIA-related advice that results in added privacy protection for government programs or initiatives	75%	94%

For indicator 1.1 and 2.1, the actual results exclude investigations into large breaches at Employment and Social Development Canada/Justice Canada and Health Canada. These incidents generated a high volume of individual complaints (677), which, if included, would affect the overall performance for cases completed within the year.

For indicator 1.2, the audit entity indicated that all thirteen recommendations have been fully implemented.

[5] A **complaint** is deemed resolved to the satisfaction of the OPC when it is closed with one of the following dispositions: Early Resolved, Well-founded and Resolved, Well-founded and Conditionally Resolved, Settled, Resolved, and Not Well-founded. An **incident** is deemed resolved when it does not indicate systemic/operational compliance issues with privacy legislation requiring OPC action or respondent's handling of incident appears acceptable to minimize the impact and mitigate the chance of a recurrence.

[6] The service standard for responding to a complaint is 12 months from the date of acceptance and the service standards for responding to information requests are: within 1 business day for information requests received by phone or in person; and within 10 business days from date of receipt for written requests.

For indicator 2.1, the percentage combines equally the timeliness for responses to 8,185 information requests and the completion of 384 PIPEDA-related complaints and 1108 *Privacy Act*-related complaints.

Regarding indicator 3.1, the OPC received 29 responses to recommendations made after reviewing PIAs and provided advice during consultations on initiatives that had privacy implications. Twenty-seven of these responses indicated that privacy protective measures had been or would be implemented by the institution in response to our recommendations. Some of the initiatives for which we received responses in 2014-15 were reviewed in previous fiscal years.

Performance Analysis and Lessons Learned

This year, the Office continued to invest in increasing the efficiency and effectiveness of its processes and in focusing its compliance activities on the areas that pose the greatest risks to privacy.

The Office introduced a new online tool that allows individuals to express concerns about a particular privacy matter electronically. This will improve the experience for the end-user, enable the identification of specific trends and privacy risks and may help OPC take action in the future, thus leading to better compliance.

The OPC continued to leverage its Toronto Office to expedite investigations under PIPEDA through site visits, given that a large number of PIPEDA respondents are located in the Greater Toronto Area. These in-person meetings can often replace months of correspondence with a single session of active conversation. Overall the Office reduced its treatment time for PIPEDA-related complaints to an average of 4.8 months, despite an increase in complaints and, in particular, multiple complaints on a single issue.

On the *Privacy Act* investigations side, the Office continued to deal with a large volume of complaints, some raising complex and systemic privacy issues. Certain mitigation strategies were implemented to manage the number of complaints that are actively investigated, including the development of a guide to manage complaints from a single complainant. In 2014-15, the Office received nearly 4,300 complaints, close to 3,000 from the same complainant. Many of these complaints were accepted and placed in abeyance. At the same time, the Office increased the use of the early resolution (ER) investigative process to resolve complaints where possible. Despite these efforts, of the *Privacy Act* complaints closed during the year, only 64 percent were closed within 12 months of acceptance. A review was launched in late 2014-15 to better understand operational challenges related to *Privacy Act*-investigations. This review will conclude in 2015-16.

The Office also underwent a "lean" exercise in order to streamline the delivery of legal services to make them more timely, efficient and integrated in support of compliance activities. As an example, the approach to providing Duty Counsel Services was reviewed and adjusted to ensure clients have more flexible access to this service while also trying to maximize lawyers' productivity. Work will continue in 2015-16 to identify additional efficiencies wherever possible.

The Office received 256 privacy breach reports from federal institutions, a 12 percent increase over the previous year following the introduction in May 2014 of mandatory breach reporting by government institutions. In view of this increasing volume, the OPC refined its procedures and practices relating to breaches, such as streamlining its process for launching Commissioner-initiated complaints where incidents present significant concerns.

With the coming into force of CASL on July 1, 2014, the OPC worked collaboratively with its enforcement partners and focused activities on educating the public and organizations about the respective mandates, sharing information on organizations of interest, identifying opportunities for collaborative enforcement action and establishing links with other domestic and international anti-spam regulatory and stakeholder partners. The Office continued to strengthen its internal technological capacity through staff training, exchange of best practices with other enforcement agencies and enhanced laboratory equipment and software.

The OPC also continued to focus on the Canada-U.S. Beyond the Border (BTB) Action Plan, providing recommendations and advice on 15 BTB initiatives, and continuing its consultations with involved government institutions throughout the year. This included the provision of guidance and advice in relation to the Entry/Exit Initiative to senior Government of Canada officials from the departments of Public Safety, the Canada Border Services Agency, the RCMP, Employment and Social Development Canada, the Canada Revenue Agency and the Privy Council Office.

In October 2014, the OPC released the results[vi] of its review of the RCMP's collection of basic subscriber information from telecommunications service providers. As well, the OPC conducted an audit of personal information safeguards on portable devices. The results of this audit will be released in 2015-16. The OPC's privacy audit manual was also updated and will be used for ongoing audits.

Finally, the Office leveraged cooperative efforts with domestic and international stakeholders in order to advance privacy protection. The OPC supported international digital education efforts as an active member of the international digital education working group, led by the French data protection agency (CNIL). The Office also continued active participation as a member of the Global Privacy Enforcement Network (GPEN) Steering Committee and was lead in the development and coordination of the GPEN Privacy Sweep with three provincial and 22 international authorities. As well, the OPC collaborated on several investigations with domestic and international partners, and on breach responses with provincial counterparts.

Program 1.2: Research and Policy Development

This program advances privacy knowledge, develops policy positions and provides strategic advice on the full range of privacy issues to Parliamentarians, government institutions and private sector stakeholders. Through this program, the OPC serves as a centre of expertise on emerging privacy issues in Canada and abroad by researching trends and technological developments, monitoring and analysing legislative and regulatory initiatives, providing strategic legal, policy and technical advice on key issues and developing policy positions that advance the protection of privacy rights in both the public and private sectors. An important part of the work involves supporting the Commissioner and senior officials in providing advice to Parliament on potential privacy implications of proposed legislation, government programs and private-sector

initiatives. Since 2004, the Program includes the administration of the *Personal Information Protection and Electronic Documents Act* Contributions Program that funds independent privacy research and related knowledge translation initiatives, to advance knowledge and promote the practical application of that knowledge in ways that enhance privacy protection for Canadians.

Budgetary Financial Resources (dollars)

2014-15 Main Estimates	2014-15 Planned Spending	2014-15 Total Authorities Available for Use	2014-15 Actual Spending (authorities used)	2014-15 Difference (actual minus planned)
3,834,863	3,834,863	3,202,156	3,040,117	(794,746)

Future reference levels have been adjusted to better align with TBS Guide on attributing internal services resources.

Human Resources (FTEs)

2014-15 Planned	2014-15 Actual	2014-15 Difference (actual minus planned)
29	17	(12)

Future reference levels have been adjusted to better align with TBS Guide on attributing internal services resources.

Performance Results

Expected Results	Performance Indicators	Targets	Actual Results
Intermediate Outcome			
1. Public- and private-sector stakeholders are enabled to develop policies and initiatives that respect privacy rights.	1.1 Percentage of stakeholder requests for guidance on policies and initiatives that were responded to by the OPC	100%	100%
Immediate Outcomes			
2. Parliamentarians are able to draw on OPC expertise to identify and address privacy issues.	2.1 Percentage of requests from parliamentarians that were responded to by the OPC within service standards	100%	100%
3. Knowledge about privacy issues is advanced.	3.1 Increased take-up of OPC research	Annual increase relative to previous year	24% increase

For indicator 1.1, in addition to responding to all requests for meetings to discuss privacy initiatives, the Office also provided responses to proposed regulations pre-published in the Canada Gazette and issued four guidance documents.

Regarding indicator 3.1, there were 7,413 visits to the English Index page and 2,054 visits to the French Index page for the Research section of the OPC website from April 1, 2014 to March 31, 2015.

Performance Analysis and Lessons Learned

With the arrival of the new Commissioner, the OPC set about renewing its privacy priorities. The Office conducted an environmental scan of current privacy challenges and past OPC work to identify potential new privacy priority themes. The Office then set about asking Canadians for their views, by means of focus group testing meetings with stakeholders in the public and private sectors, academia, civil society, consumer groups and provincial and territorial commissioners. The new priorities[vii] were announced in early 2015-16, along with the planned activities to advance the priorities.

One area that was part of the Office's priority work in the past, genetics, was an important area of focus in 2014. In July, the OPC issued a statement[viii] on the use of genetic test results by life and health insurance companies, urging the life and health insurance industry to call on its members to refrain from asking applicants for access to existing genetic test results for the purposes of underwriting an insurance policy at this time. This issue has prompted the introduction of private members' bills at both the federal and provincial levels and warranted mention in the 2013 Speech from the Throne.

In terms of domestic relations, the OPC renewed its MOU with Alberta and British Columbia to continue to collaborate on private sector investigations and policy and research work. The Office co-hosted the Federal/Provincial/Territorial (FPT) Commissioners meeting in Ottawa which, as a group, committed to continue working strategically on issues. In that regard, the OPC, along with all provincial and territorial offices, issued a joint statement on Privacy and National Security, and a guidance document for law enforcement agencies on body-worn cameras[ix]. The Office also released joint guidance on online consent[x] with Alberta and British Columbia.

On the international front, a Global Cross Border Enforcement Cooperation Arrangement was endorsed by data protection authorities. Its goal is to foster more coordinated approaches to address cross-border privacy issues. The OPC was also a signatory to other international resolutions on Big Data and the Internet of Things during the 36th International Data Protection and Privacy Commissioner's Conference in Mauritius.

Furthermore, the OPC made 31 written submissions and/or appearances[7] before Parliament in 2014-15on significant bills, such as S-4, which amends PIPEDA, Bill C-13, the *Protecting Canadians from Online Crime Act,* which expands the ways in which law enforcement can obtain personal information and Bill C-51, the *Anti-Terrorism Act,* which broadens information sharing within government to combat terrorism. The Office's written submissions and parliamentary appearances are available on the OPC's website[xi].

The OPC also continued to support guidance and research in privacy. It issued guidelines on data retention and destruction[xii] and on online consent[xiii] and published research papers on data brokers[xiv] and privacy and cybersecurity[xv]. The OPC also published a technical and legal overview of metadata and privacy[xvi]. Metadata is the data trail generated each time someone uses a mobile device, computer, telephone or other technologies. The paper concluded that organizations should not underestimate what metadata could reveal about an individual.

[7] This includes appearances before Committee with no written submission, just written submissions (and no appearance), or both.

The OPC Contributions Program, established in 2004 to fund privacy research and outreach activities, was renewed for five years in March 2015. An independent summative evaluation[xvii] of the program was conducted prior to its renewal, the findings of which were very positive. The evaluation found that the program continues to address a demonstrated need, is meeting PIPEDA's intent and is seen to be producing good value for money. Examples of funded projects in 2014-15 include a study of smart vehicle technology, a documentary about privacy and genealogy and an app to educate kids about online privacy. The program also awarded funding for the organisation and hosting of the third *Pathways to Privacy Research Symposium*. The most recent edition dubbed *A Return to First Principles for Privacy at the Cutting-Edge* was held at the University of Ottawa. Information on the OPC's Contributions Program and the projects it has funded in the past is available in the Research section of the OPC's website[xviii].

Program 1.3: Public Outreach

This Program promotes public awareness and understanding of rights and obligations under federal privacy legislation. Through this program, the OPC delivers public education and communications activities, including speaking engagements and special events, exhibiting, media relations, and the production and distribution of promotional and educational material. Through public outreach activities, individuals are informed about privacy and personal data protection. Such activities also enable federal and private-sector organizations to better understand their obligations under federal privacy legislation.

Budgetary Financial Resources (dollars)

2014-15 Main Estimates	2014-15 Planned Spending	2014-15 Authorities Available for Use	2014-15 Actual Spending (authorities used)	2014-15 Difference (actual minus planned)
3,096,659	3,096,659	2,573,482	2,508,474	(588,185)

Future reference levels have been adjusted to better align with TBS Guide on attributing internal services resources.

Human Resources (FTEs)

2014-15 Planned	2014-15 Actual	2014-15 Difference (actual minus planned)
21	18	(3)

Future reference levels have been adjusted to better align with TBS Guide on attributing internal services resources.

Performance Results

Expected Results	Performance Indicators	Targets	Actual Results
Intermediate Outcome			
1. Federal government institutions and private-sector organizations better understand their obligations under federal privacy legislation and individuals better understand their rights.	1.1 Percentage of private-sector organizations that are moderately or highly aware of their obligations under federal privacy legislation	85%	Biennial survey – next survey in 2015-16
	1.2 Percentage of Canadians who feel they know about	20%	32%

Expected Results	Performance Indicators	Targets	Actual Results
	their privacy rights		
Immediate Outcomes			
2. Federal government institutions and private-sector organizations have access to useful information about their privacy responsibilities and individuals have access to relevant and timely information to protect their privacy rights.	2.1 Annual increase in website visits	Visits to OPC websites increase year over year	31% increase

For indicator 1.1, the OPC surveys over 1,000 Canadian businesses (stratified by size) every two years to better understand the extent to which businesses are familiar with privacy issues and requirements and the types of privacy policies and practices they have in place. The next survey of Canadian businesses will take place in 2015-16. The results will be communicated in the 2015-16 *Departmental Performance Report.*

Performance Analysis and Lessons Learned

Privacy concerns among Canadians continue to increase. The OPC's biennial Survey of Canadians found that nine in 10 Canadians were concerned about privacy. One in three (34%) said they were *extremely* concerned – up significantly from 25 percent in 2012. More than seven in 10 Canadians (73%) said they feel they have less protection of their personal information in their daily lives – the highest level in a decade. This increase in concern has likely impacted the number of media requests to the Office, as well as website visits.

Media requests increased sharply (50%), particularly in the latter part of the year when the subject of national security and anti-terrorism dominated the news agenda. The Office received more media requests related to Bill C-51, the *Anti-terrorism Act, 2015*, than for any other single issue in recent years. The Office has seen a jump in requests from mainstream print and broadcast journalists as well as bloggers and other online publishers.

The OPC continued to enhance its website to ensure the information it offers is as accessible as possible to an ever-growing number of visitors. A number of improvements were made to the way information is presented on the website. For example, changes were made to help organizations find relevant guidance for privacy compliance more easily. As well, a new interactive tool was launched to help visitors determine what privacy authority might be best suited to assist them with a particular privacy issue, given certain jurisdictional complexities.

The OPC also completed a project to make the website more mobile friendly by optimizing it for cellphone and tablet users. Usability testing performed in 2014-15 has provided a roadmap for further enhancements in 2015-16 and beyond, to meet the needs of website visitors.

The OPC developed communications strategies related to its Annual Reports to Parliament; Bill C-51; its joint statement with provincial and territorial counterparts on privacy, national security

and law enforcement; and our Office's participation in the annual Global Privacy Enforcement Network Privacy Sweep, to name a few. The implementation of these strategies helped raise the profile of privacy issues for individuals and organizations subject to PIPEDA and the *Privacy Act*.

The OPC disseminated resources about online privacy to young people through new and existing channels. The Office reached out through public libraries across Canada, as well as to new and experienced teachers through email blasts to promote its popular graphic novel. The OPC also communicated more frequently through Twitter, and increased its use of multimedia and infographics on social media, further increasing engagements with the public.

The OPC continued to communicate with national associations representing small- and medium-sized enterprises within specific industry sectors to promote best privacy practices, in part through new tools such as infographics. For Data Privacy Day, the OPC promoted strong privacy practices as being good for business with an article on the subject that was picked up by more than 20 community newspapers across Canada and an op-ed piece[xix] from the Commissioner that was published by six major dailies. The Office also began work on a new strategy for targeted outreach to small businesses, which it expects to start implementing in 2015-16.

The Office undertook more than 70 private-sector outreach activities through its Toronto Office. Outreach involved presentations, exhibits and other stakeholder events aimed at gathering and sharing information about emerging privacy issues, recent OPC investigative findings and guidance. In response to industry demand, more reports of findings and case summaries were published and communicated as a way to help organizations better understand their privacy responsibilities. As well, select cases under both public and private sector laws were highlighted in public communications throughout the year and in Annual Reports to Parliament.

And finally, the OPC continued to provide guidance to federal government institutions. The Office delivered PIA information sessions to representatives from 35 organizations and presented to the International Association of Privacy Professionals (IAPP) on how to identify and mitigate privacy risks using PIAs and Threat Risk Assessments (TRA). The Office also published "What to Expect during a Complaint Investigation under the *Privacy Act*[xx]" to help respondents and complainants better understand the investigative process.

Internal Services

Internal Services are groups of related activities and resources that are administered to support the needs of programs and other corporate obligations of an organization. The OPC's internal services include Management and Oversight Services, Human Resources Management Services, Financial Management Services, Information Management Services, Information Technology Services, Real Property Services, Materiel Services, Acquisition Services, and Travel and Other Administrative Services. Internal Services include only those activities and resources that apply across an organization and not those provided to a specific program.

Budgetary Financial Resources (dollars)

2014-15 Main Estimates	2014-15 Planned Spending	2014-15 Total Authorities Available for Use	2014-15 Actual Spending (authorities used)	2014-15 Difference (actual minus planned)
5,716,909	5,716,909	7,849,119	7,990,102	2,273,193

Future reference levels have been adjusted to better align with TBS Guide on attributing internal services resources.

Human Resources (FTEs)

2014-15 Planned	2014-15 Actual	2014-15 Difference (actual minus planned)
50	50	0

Future reference levels have been adjusted to better align with TBS Guide on attributing internal services resources.

Performance Results

Expected Results	Performance Indicator	Target	Actual Results
The OPC achieves a standard of organizational excellence, and managers and staff apply sound business management practices.	Percentage of the Management Accountability Framework (MAF) areas rated strong or acceptable[8]	70%	This performance indicator was changed to "percentage of MAF areas where no major gaps have been identified" given that the MAF assessment no longer includes formal ratings as of 2014-15. Actual results in 2014-15: 100%

Performance Analysis and Lessons Learned

The OPC gained insight into its management practices through the conduct of its biennial MAF self-assessment. This year's self-assessment focussed on Financial Management; People Management; Information Management and Information Technology (IM/IT) Management; and, Integrated Management of Risk, Planning and Performance. Some minor gaps were identified, namely the need to finalize and formally approve the Internal Control Management Framework; establish service standards for the OPC's transfer payment program and, make greater use of its Performance Measurement Framework in the context of strategic planning discussions and performance management. Many of these gaps were addressed during the year.

The Office worked to support employees throughout key transitions, particularly in relation to the appointment of a new Commissioner and the move of OPC headquarters. Change management tools were further simplified for use during various change/transition activities in

[8] The MAF is a tool that outlines expectations for sound public management practices and performance. Each year most departments and agencies are assessed by the Treasury Board Secretariat (TBS) against this tool. As an agent of Parliament, the OPC is not subject to a MAF assessment by TBS. Nonetheless, the Office conducts a comprehensive self-assessment exercise against the MAF biennially, as well as a status update on improvements in the intervening years. The OPC uses this exercise as a report card on its 'state of management' and to provide a level of assurance to the Commissioner on the OPC's compliance with Treasury Board policies.

order to strengthen our communication and engagement with staff. Internal communications were also enhanced using new tools such as digital signage in common areas which improved access to documents and information.

The Office undertook an internal audit of IM/IT Governance[xxi] which focussed on processes supporting IM/IT strategic planning, applications development and change control and project management. The audit highlighted good practices at the OPC and made useful recommendations to improve the effectiveness of its current IM/IT governance processes. The Office will work to implement these recommendations in the coming year.

The Office promoted greater use of technology to enhance the OPC's knowledge/collaboration environment and to deliver on its mandate. With the launch of our Knowledge Centre, a number of resources were created that could be leveraged to inform and support OPC employees in the conduct of their work. The Office was not able to implement a new secure electronic communication tool, the Secure Portal, as originally planned due to financial and resource constraints. The design and feasibility of such a tool will be examined in 2015-16. In the meantime, the Office has identified other secure means of sharing electronic documents with certain federal institutions that handle high volumes of complaints.

To remain responsive and better support the delivery of services to Canadians, the Office reviewed and made certain changes to organizational structures. Collective recruitment initiatives undertaken across branches also provided the flexibility needed to respond to changing demands. The implementation of a leadership development program was put on hold pending the completion of the priority-setting exercise and the implementation of the Canada School of Public Service's (CSPS) new enterprise-wide approach to management development.

The OPC continued its efforts to review and modernize its Human Resources processes and systems to effectively support the organization and to align with the Government of Canada's Human Resources Modernization initiative. To this end, the Office successfully implemented the Common HR Business Process. Work has also begun to position the OPC for its scheduled move to MyGCHR in October 2015 and the new Pay System (Phoenix) in December 2015. The OPC also drafted a revised Integrated Business Human Resources Plan that will be finalized once the privacy priority-setting exercise has been completed so as to ensure alignment with the new directions.

And finally, the OPC continued to engage staff in dialogue around Blueprint 2020 opportunities to streamline processes and explored a number of opportunities for collaborative services with other Agents of Parliament and other federal government departments to create efficiencies in the provision of internal services at the OPC, while maintaining the independence of the Office. For instance, the Office moved to a new financial system called GX hosted by the Canadian Human Rights Commission. The Office also initiated various collaborative opportunities with other Agents of Parliament in the area of IT support, training and HR systems implementation. Discussions will continue in 2015-16 to determine the feasibility of further service delivery models.

Section III: Supplementary Information

The financial highlights presented in this section are drawn from the OPC's financial statements and have been prepared using Government of Canada accounting policies, which are based on Canadian public sector accounting standards.

Financial Statements Highlights

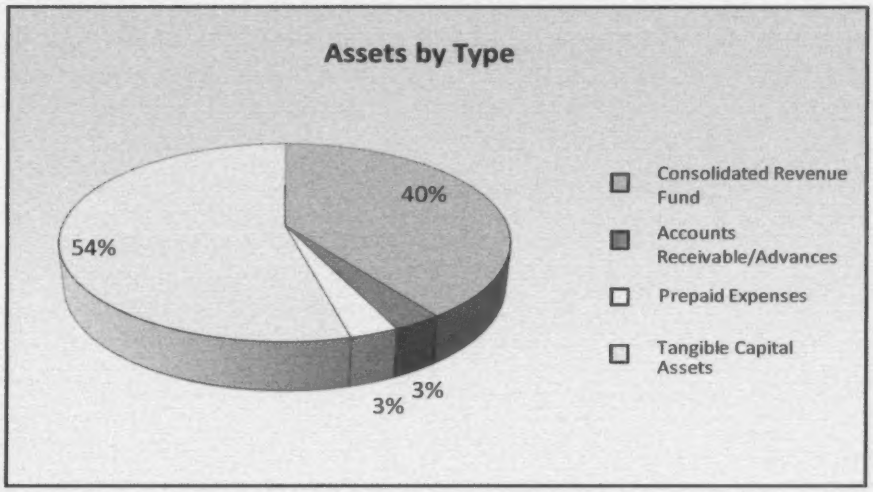
Condensed Statement of Operations
For the Year Ended March 31, 2015
(dollars)

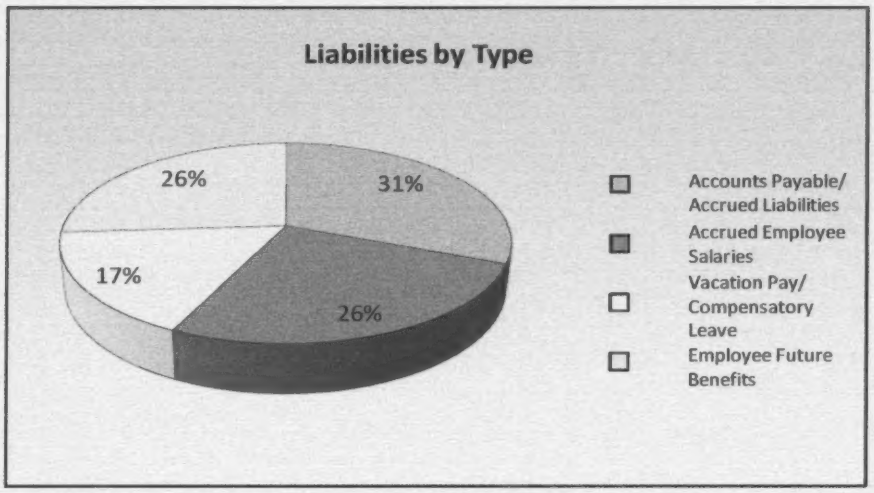
Financial Information	2014-15 Planned Results	2014-15 Actual	2013-14 Actual	Difference (2014-15 actual minus 2014-15 planned)	Difference (2014-15 actual minus 2013-14 actual)
Total expenses	27,943,301	27,942,812	28,989,407	(489)	(1,046,595)
Total revenues	0	0	0	0	0
Net cost of operations before government funding and transfers	27,943,301	27,942,812	28,989,407	(489)	(1,046,595)

Condensed Statement of Financial Position
As at March 31, 2015
(dollars)

Financial Information	2014-15	2013-14	Difference (2014-15 minus 2013-14)
Total net liabilities	4,669,595	4,594,469	75,126
Total net financial assets	2,733,148	2,546,412	186,736
Departmental net debt	1,936,447	2,048,057	(111,610)
Total non-financial assets	3,609,053	3,613,406	(4,353)
Departmental net financial position	1,672,606	1,565,349	107,257

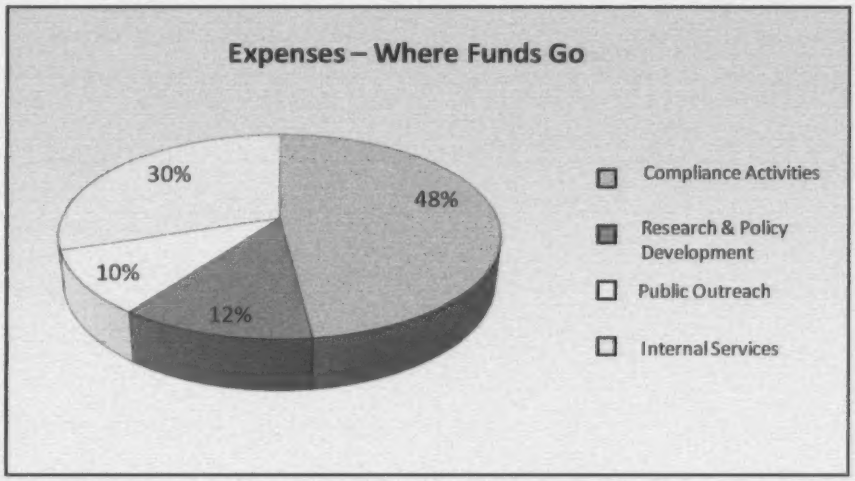
Total assets were $6,342K at the end of 2014-15, an increase of $182K (3%) over the previous year's total assets of $6,160K. Of the total assets, the Consolidated Revenue Fund totaled $2,533K (40%) while $3,422K (54%) represented Tangible Capital Assets. Accounts Receivable and Advances and Prepaid Expenses accounted for three percent each of total assets, respectively.





Total liabilities were $4,669K at the end of 2014-15, an increase of $74K (1.6%) over the previous year's total liabilities of $4,595K. Accounts Payable/Accrued Liabilities represented the largest portion of the total liabilities, at $1,444K (31%). Employee Future Benefits represented a smaller portion of liabilities, at $1,193K, or 26 percent of the total. Vacation Pay and Compensatory Leave and Accrued Employee Salaries accounted for 17 percent and 26 percent of total liabilities, respectively.

Total expenses for the OPC were $27,942K in 2014-15.The largest share of the funds, $13,456K, or 48 percent, was spent on Compliance Activities, while Internal Services represented $8,379K of the expenditures or 30 percent of the total. Research and policy development represented $3,345K, or 12 percent, of total expenses. Public Outreach efforts represented $2,762K of the expenditures, or 10 percent of the total. (Note that expenses by program activity might differ from those identified in the Public Accounts of Canada due to the methodology used to prorate the allocation in the financial statements as well as the inclusion of related party transactions.)



Financial Statements

Information on the OPC's audited financial statements can be found on its website[xxii].

Supplementary Information Tables

The supplementary information tables listed in the *2014-15 Departmental performance Report* are available on the OPC's website[xxiii].

- Internal Audits and Evaluations;
- Departmental Sustainable Development Strategy (Greening Government Operations); and,
- User Fees, Regulatory Charges and External Fees.

Approved internal audit and evaluation reports are available on the OPC's website[xxiv].

Tax Expenditures and Evaluations

The tax system can be used to achieve public policy objectives through the application of special measures such as low tax rates, exemptions, deductions, deferrals and credits. The Department of Finance Canada publishes cost estimates and projections for these measures annually in the *Tax Expenditures and Evaluations*[xxv] publication. The tax measures presented in the *Tax Expenditures and Evaluations* publication are the sole responsibility of the Minister of Finance.

Section IV: Organizational Contact Information

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Appendix: Definitions

appropriation (*crédit*): Any authority of Parliament to pay money out of the Consolidated Revenue Fund.

budgetary expenditures (*dépenses budgétaires*): Includes operating and capital expenditures; transfer payments to other levels of government, organizations or individuals; and payments to Crown corporations.

Departmental Performance Report (*rapport ministériel sur le rendement*): Reports on an appropriated organization's actual accomplishments against the plans, priorities and expected results set out in the corresponding Report on Plans and Priorities. These reports are tabled in Parliament in the fall.

full-time equivalent (*équivalent temps plein*): A measure of the extent to which an employee represents a full person-year charge against a departmental budget. Full-time equivalents are calculated as a ratio of assigned hours of work to scheduled hours of work. Scheduled hours of work are set out in collective agreements.

Government of Canada outcomes (*résultats du gouvernement du Canada*): A set of 16 high-level objectives defined for the government as a whole, grouped in four spending areas: economic affairs, social affairs, international affairs and government affairs.

Management, Resources and Results Structure (*Structure de la gestion, des ressources et des résultats*): A comprehensive framework that consists of an organization's inventory of programs, resources, results, performance indicators and governance information. Programs and results are depicted in their hierarchical relationship to each other and to the Strategic Outcome(s) to which they contribute. The Management, Resources and Results Structure is developed from the Program Alignment Architecture.

non-budgetary expenditures (*dépenses non budgétaires*): Includes net outlays and receipts related to loans, investments and advances, which change the composition of the financial assets of the Government of Canada.

performance (*rendement*): What an organization did with its resources to achieve its results, how well those results compare to what the organization intended to achieve and how well lessons learned have been identified.

performance indicator (*indicateur de rendement*): A qualitative or quantitative means of measuring an output or outcome, with the intention of gauging the performance of an organization, program, policy or initiative respecting expected results.

performance reporting (*production de rapports sur le rendement*): The process of communicating evidence-based performance information. Performance reporting supports decision making, accountability and transparency.

planned spending (*dépenses prévues*): For Reports on Plans and Priorities (RPPs) and Departmental Performance Reports (DPRs), planned spending refers to those amounts that receive Treasury Board approval by February 1. Therefore, planned spending may include amounts incremental to planned expenditures presented in the Main Estimates.

A department is expected to be aware of the authorities that it has sought and received. The determination of planned spending is a departmental responsibility and departments must be able to defend the expenditure and accrual numbers presented in their RPPs and DPRs.

plan (*plan*): The articulation of strategic choices, which provides information on how an organization intends to achieve its priorities and associated results. Generally, a plan will explain the logic behind the strategies chosen and tend to focus on actions that lead up to the expected result.

priorities (*priorité*): Plans or projects that an organization has chosen to focus and report on during the planning period. Priorities represent the things that are most important or what must be done first to support the achievement of the desired Strategic Outcome(s).

program (*programme*): A group of related resource inputs and activities that are managed to meet specific needs and to achieve intended results and that are treated as a budgetary unit.

Program Alignment Architecture (*architecture d'alignement des programmes*)**:** A structured inventory of an organization's programs, depicting the hierarchical relationship between the programs and the Strategic Outcome(s) to which they contribute.

Report on Plans and Priorities (*rapport sur les plans et les priorités*): Provides information on the plans and expected performance of appropriated organizations over a three-year period. These reports are tabled in Parliament each spring.

result (*résultat*): An external consequence attributed, in part, to an organization, policy, program or initiative. Results are not within the control of a single organization, policy, program or initiative; instead they are within the area of the organization's influence.

statutory expenditures (*dépenses législatives*): Expenditures that Parliament has approved through legislation other than appropriation acts. The legislation sets out the purpose of the expenditures and the terms and conditions under which they may be made.

strategic outcome (*résultat stratégique*): A long-term and enduring benefit to Canadians that is linked to the organization's mandate, vision and core functions.

sunset program (*programme temporisé*): A time-limited program that does not have an ongoing funding and policy authority. When the program is set to expire, a decision must be made whether to continue the program. In the case of a renewal, the decision specifies the scope, funding level and duration.

target (*cible*): A measurable performance or success level that an organization, program or initiative plans to achieve within a specified time period. Targets can be either quantitative or qualitative.

voted expenditures (*dépenses votées*): Expenditures that Parliament approves annually through an Appropriation Act. The Vote wording becomes the governing conditions under which these expenditures may be made.

whole-of-government framework (*cadre pangouvernemental*): Maps the financial contributions of federal organizations receiving appropriations by aligning their programs to a set of 16 government-wide, high-level outcome areas, grouped under four spending areas.

Endnotes

[i] *Privacy Act,* http://laws-lois.justice.gc.ca/eng/acts/P-21/FullText.html

[ii] *Personal Information Protection and Electronic Documents Act,* http://laws-lois.justice.gc.ca/eng/acts/P-8.6/FullText.html

[iii] Whole-of-government framework, http://www.tbs-sct.gc.ca/ppg-cpr/frame-cadre-eng.aspx

[iv] *Public Accounts of Canada 2015,* http://www.tpsgc-pwgsc.gc.ca/recgen/cpc-pac/index-eng.html

[v] Public Works and Government Services Canada website, http://www.tpsgc-pwgsc.gc.ca/recgen/cpc-pac/index

[vi] Review of the Royal Canadian Mounted Police – Warrantless Access to Subscriber Information, https://www.priv.gc.ca/information/ar/201314/201314_pa_e.asp#heading-0-0-4

[vii] The OPC Privacy Priorities 2015-2020, https://www.priv.gc.ca/information/pub/pp_2015_e.asp

[viii] OPC Statement on the Use of Genetic Test Results by Life and Health Insurance Companies, https://www.priv.gc.ca/media/nr-c/2014/nr-c_140710_e.asp

[ix] Guidance for the use of body-worn cameras by law enforcement authorities, https://www.priv.gc.ca/information/pub/gd_bwc_201502_e.asp

[x] Joint guidance on online consent with Alberta and British Columbia, https://www.priv.gc.ca/information/guide/2014/gl_oc_201405_e.asp

[xi] OPC Submissions to Parliament and Appearances Before Parliamentary Committees, https://www.priv.gc.ca/parl/index_e.asp

[xii] Personal Information Retention and Disposal: Principles and Best Practices, https://www.priv.gc.ca/information/pub/gd_rd_201406_e.asp

[xiii] Guidelines for online consent, https://www.priv.gc.ca/information/guide/2014/gl_oc_201405_e.asp

[xiv] Data Brokers: A Look at the Canadian and American Landscape, https://www.priv.gc.ca/information/research-recherche/2014/db_201409_e.asp

[xv] Privacy and Cyber Security, https://www.priv.gc.ca/information/research-recherche/2014/cs_201412_e.asp

[xvi] Metadata and Privacy, A Technical and Legal Overview, https://www.priv.gc.ca/information/research-recherche/2014/md_201410_e.asp

[xvii] Independent Summative Evaluation of OPC Contributions Program, https://www.priv.gc.ca/information/pub/ia/2014/eval_rep_2014_e.asp

[xviii] OPC Contributions Program, https://www.priv.gc.ca/resource/cp/p_index_e.asp

[xix] Op Ed piece from the Privacy Commissioner of Canada on privacy good for business, https://www.priv.gc.ca/media/nr-c/2015/oped_150128_e.asp

[xx] OPC Guide *What to expect during a complaint investigation under the Privacy Act*, https://www.priv.gc.ca/information/pub/gd_exp_pa_201503_e.asp

[xxi] Internal Audit of IM/IT Governance, https://www.priv.gc.ca/information/pub/ia/2015/iac_imit_2015_e.asp

[xxii] OPC Audited Financial Statements, http://www.priv.gc.ca/information/02_05_e_e.asp#oag

[xxiii] Supplementary Information Tables, http://www.priv.gc.ca/information/dpr-rmr/2014-2015/st-ts01_e.asp

[xxiv] Approved OPC internal audits and evaluation reports, http://www.priv.gc.ca/information/02_05_e_e.asp#ia

[xxv] Department of Finance Tax Expenditures and Evaluation Report, http://www.fin.gc.ca/purl/taxexp-eng.asp